

CENTENNIAL COMMUNICATIONS

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February 1, 2007

Kris Monteith, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Room 7-C723
Washington, DC 20554

Fred Campbell, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Sixteenth Quarterly Report of
Centennial Communications Corp. on E911 Compliance**

Dear Ms. Monteith and Mr. Campbell:

Pursuant to the FCC's *Order to Stay* issued in CC Docket No. 94-102,¹ and the FCC's *Order* issued in WT Docket No. 05-314,² Centennial Communications Corp. ("Centennial") hereby files this sixteenth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on November 10, 2006. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico and the U.S. Virgin Islands, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.³

I. Puerto Rico/U.S. Virgin Islands

¹ FCC 02-210, released July 26, 2002.

² FCC 06-65, released January 5, 2007, ¶ 19 (*hereinafter* "the January 5 Order").

³ See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Although Centennial initially deployed a network-based solution to effectuate E911 service in Puerto Rico, Centennial has since initiated a complete upgrade of its system there. As part of that overhaul, Centennial has upgraded from Lucent to Nortel switches, effectively replacing its entire network. Consequently, Centennial necessarily switched from a network- to a handset-based solution for the provision of E911 services, thus potentially increasing the overall system reliability and accuracy with which subscribers can be located in an emergency, through use of GPS-enabled devices in individual handsets.

A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004, and both Phase I and Phase II service has since been implemented via a network-based solution.

With respect to the switch to a handset-based solution, Centennial worked closely with the PSAP in Puerto Rico to make sure that the PSAP's needs were met as soon as practicable. Significantly, Centennial committed to maintaining its network-based E911 solution, concurrent with adapting to a handset-based solution, until December 31, 2006. As of January 16, 2007, Centennial's GPS-capable handset penetration rate had reached 98%.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however at this point, neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

Domestic Markets

Through five different subsidiaries,⁴ Centennial now holds licenses to provide digital cellular and PCS service in 34 markets in the Midwest and Southern United States. Centennial provides CMRS in the following six states: Indiana, Louisiana,

⁴ Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

Michigan, Mississippi, Ohio and Texas. Centennial utilizes both TCS and Intrado as its E911 partners and has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁵

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. To date, we have initiated Phase I E911 service to 149 PSAPs in our domestic markets. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our existing Indiana, Michigan and Texas markets. Centennial also notes that, to date, we have received three valid requests for Phase I E911 service from PSAPs in the state of Ohio. Since the filing of our last report, the Paulding County, OH PSAP implementation issues were resolved, and Phase I service has been initiated. We have received a new request for Phase I service from the Delaware County, Indiana PSAP (new market launch for Centennial). We expect to implement Phase I service to PSAPs in Williams County, Ohio and Winn Parish, Louisiana in March 2007.

Phase II Service - We are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. Since the filing of our last quarterly report, Centennial has activated one new PSAP to Phase II compliance (Lincoln County, MS). In total, we have integrated eighty-four PSAP markets into a "Live" status, and we have seven markets in various stages of the implementation process.

As we previously reported, Centennial continued to experience deployment difficulties in two central Michigan counties - Ogemaw and Roscommon - due to lack of cell site density. While Phase II implementation was attempted, it was unsuccessful due to accuracy issues. (In order to complete triangulation, non-radio equipped sites are strategically placed in order to locate distress calls.) In order to improve accuracy to an acceptable level, we made site adjustments and are deploying equipment at five Phase II GEO-only sites. Since our last report, we have commenced hardware installation at three of the sites in Roscommon and Ogemaw counties, and we expect integration of both counties to be completed by February 15. In addition, we have completed construction at the two additional GEO-only sites, and installation of 911 equipment is to commence at both sites this month. While this is a time-consuming process, which is further complicated by the lack of

⁵ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

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cell tower sites in the region, we remain in regular contact with the affected PSAP directors, and they have not objected to our revised deployment schedule.

Centennial has successfully integrated all Texas PSAPs to Phase II status that have requested Phase II service. Presently, we have no pending Phase II E911 service requests for Ohio and two pending Phase II requests from PSAPs in Mississippi. The Defiance County, OH PSAP has rescinded its Phase II request due to equipment issues. In Mississippi, Phase II service was deployed to the Lincoln County PSAP, and we have pending Phase II requests from the Simpson and Jefferson County PSAPs. As with the Michigan sites, Centennial is experiencing implementation issues in these two counties due to lack of cell site density. Accordingly, in Simpson County, Centennial intends to install three GEO-only sites in order to resolve the implementation issues. The three sites have been identified and leases are in process for these sites. Jefferson County also will require two GEO-only sites in order to be Phase II compliant. Finally, Centennial has pending requests from PSAPs in Newton and Delaware Counties in Indiana and Franklin, Madison and Tangipahoa Parishes in Louisiana. Centennial continues to work cooperatively with PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, Centennial is presently in compliance with all applicable Phase II deployment benchmarks, either through meeting the six-month deadline, or negotiating mutually acceptable alternative deployment dates. Phase I & II implementation remain a high priority with Centennial for each of the PSAPs in its domestic markets. Centennial will continue to work cooperatively with PSAPs to deliver the requested service in a timely and efficient manner.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me.

Sincerely,

/s/ William Roughton

William Roughton

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